EXHIBIT 3 Redacted Version of Document Filed Under Seal

Case 3:17-cv-00939-WHA Document 1048-10 Filed 07/28/17 Page 2 of 9 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

```
1
                  UNITED STATES DISTRICT COURT
 2.
                 NORTHERN DISTRICT OF CALIFORNIA
 3
                     SAN FRANCISCO DIVISION
 4
 5
 6
     WAYMO LLC,
 7
                    Plaintiff,
 8
                                          )
                                             Case No.
        vs.
 9
     UBER TECHNOLOGIES, INC.;
                                         ) 17-cv-00939-WHA
     OTTOMOTTO, LLC; OTTO TRUCKING LLC, )
10
11
                   Defendants.
                                          )
12
13
       HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY
14
           VIDEOTAPED DEPOSITION OF JENNIFER HAROON
15
16
                    San Francisco, California
17
                    Wednesday, July 26, 2017
                            Volume I
18
19
20
     Reported by:
     MARY J. GOFF
21
22
     CSR No. 13427
     Job No. 2664313
23
24
     PAGES 1-222
25
                                                     Page 1
```

Case 3:17-cv-00939-WHA Document 1048-10 Filed 07/28/17 Page 3 of 9 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

A I think sometimes employees would just 09:40:3	6
2 check with their manager. And perhaps their manager 09:40:3	8
3 didn't I I don't know what the manager 09:40:4	1
thought, but I didn't then follow the rest of the 09:40:4	4
5 process. 09:40:4	7
Q Okay. Does Waymo have any internal 09:40:4	8
7 guidelines or policy documents defining what 09:41:0	1
8 information is confidential and what is not? 09:41:0	5
9 MS. BAILY: Object to form. 09:41:0	7
10 A So when I joined, one of the first things 09:41:1	3
I talked to Chris about and was included in his 09:41:1	7
comments for our, what we call, the Chauffeur 09:41:2	1
Noogler orientation was about confidentiality. 09:41:2	5
The project, unlike some at Google, was 09:41:3	1
confidential even within Google, so and that was 09:41:3	4
different coming from another Google project. So it 09:41:3	8
was clearly something that was important. And so 09:41:4	1
confidentiality is something we talked about a lot 09:41:4	4
19 as a company and as a team. 09:41:4	6
In terms of a specific document, I can't 09:41:5	0
21 think of one. Although, that doesn't mean one 09:41:5	3
doesn't exist. I just can't think of one off the 09:41:5	6
23 top of my head. 09:41:5	9
Q Okay. But to the best of your knowledge, 09:42:0	1
25 there's no such document? 09:42:0	2
Page 24	

Case 3:17-cv-00939-WHA Document 1048-10 Filed 07/28/17 Page 4 of 9 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

1	identification and is attached to the transcript.)	09:55:29
2	Q Okay. Ms. Haroon, the reporter has handed	09:55:30
3	you what's been marked as Exhibit 1136. Can you	09:55:50
4	look at through this, please	09:55:55
5	A Yes.	09:55:56
6	Q and let me know when I can ask a	09:55:56
7	question?	09:55:58
8	A Okay.	09:58:44
9	Q Do you recognize this document?	09:58:44
10	A I do.	09:58:46
11	Q Okay. And what is this document?	09:58:47
12		
		09:59:02
17	Q And what was the purpose of those	09:59:06
18	discussions?	09:59:09
19	A They varied. They normally involved	09:59:15
20	talking about progress on the project, some of our	09:59:18
21	future plans. And in this case, also budget.	09:59:23
22	Q Okay. And the document is entitled	09:59:29
23	"Self-Driving Car: 2016 Budget, Including HC	09:59:34
24	Plans," correct?	09:59:39
25	A Correct.	09:59:40
		Page 32

Case 3:17-cv-00939-WHA Document 1048-10 Filed 07/28/17 Page 5 of 9 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

Q Okay.	01:41:24
A So some of the supporting documents	01:42:10
support some of the things that I have already	01:42:13
mentioned that are no longer part of	01:42:16
Q Understood.	01:42:19
A were no longer part of the plan.	01:42:19
Q Understood.	01:42:21
MS. BAILY: Just for the written record,	01:42:22
the witness obviously did not read every line of	01:42:22
this document. I that's not what I understood	01:42:25
you to ask her to do, but for the written record.	01:42:27
MR. TAKASHIMA: Agreed.	01:42:31
Q (BY MR. TAKASHIMA) Flipping back to the	01:42:32
page ending 1484.	01:42:33
A 1484.	01:42:36
	01:42:52
	Page 108

Case 3:17-cv-00939-WHA Document 1048-10 Filed 07/28/17 Page 6 of 9 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

1		
		02:10:17
7	So for example, between for February	02:10:21
8	and March 2016, those are not necessarily unique	02:10:24
9	times that we relooked at this.	02:10:29
10	Q Okay. But these these four dates seem	02:10:31
11	to indicate that there was some revisit in 2016,	02:10:37
12	2014, and 2013; is that fair to say?	02:10:40
13	MS. BAILY: Object to form.	02:10:44
14	A That's fair to say. Although, I don't	02:10:46
15	know if the 2013 was a revisit or potentially the	02:10:48
16	original. I wasn't there.	02:10:51
17	Q The visit. Okay. Are those are those	02:10:53
18	dates I mean, in the native format of this	02:11:08
19	document, would those dates be links?	02:11:11
20	MS. BAILY: Object to form.	02:11:14
21	A Yes.	02:11:15
22	Q Okay. To what?	02:11:17
23	MS. BAILY: Object to form.	02:11:18
24	A I don't remember. Likely to a slide	02:11:22
25	discussion document.	02:11:27
		Page 124

Case 3:17-cv-00939-WHA Document 1048-10 Filed 07/28/17 Page 7 of 9 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

that we received. 03:26 A Okay. 03:26 But let's note let's note for the 03:26 record that whatever page number that is. What 03:26 page is that? 03:26	:15 :19 :20 :23
Q But let's note let's note for the 03:26 4 record that whatever page number that is. What 03:26	:19 :20 :23
record that whatever page number that is. What 03:26	:20
	:23
5 page is that? 03:26	
	:24
6 A Slide 9. 03:26	1
Q We'll note for the record that Slide 9 is 03:26	:25
8 blank when you click on it. 03:26	:28
9 THE VIDEOGRAPHER: Can you turn your 03:26	:53
10 microphone is the wrong way. 03:26	:55
11 A Slide 20 is also blank. 03:27	:09
Q (BY MR. TAKASHIMA) Okay. 03:27	:11
13 A And 21. 03:27	:27
Q So leaving aside the pages noted that are 03:28	:17
blank, do you recognize that document? 03:28	:21
16 A Yes. 03:28	:24
17 Q Okay. And what is it? 03:28	:25
A It's a discussion document it looks 03:28	:27
like it's still a work in progress in preparation 03:28	:33
for a discussion between John Krafcik and 03:28	:39
potentially other members of the Chauffeur team and 03:28	:44
22 03:28	:48
Q And was that just a periodic discussion or 03:28	:57
was there something in particular that triggered it? 03:28	:59
25 A It looks like a preview to our 2017 03:29	:05
Page 1	.52

Case 3:17-cv-00939-WHA Document 1048-10 Filed 07/28/17 Page 8 of 9 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

	INGILE CONTIDENTIAL OCTOBE COCHSELS ETE	S GIVE I
1	supplier team.	04:42:49
2	Q Okay. And then, I guess, respectively	04:42:49
3	headcount for products, business and operations?	04:42:55
4	A Right. And business is broadly	04:42:59
5	includes things like marketing, PR, policy.	04:43:03
6	Q Okay. I understand that you're not	04:43:06
7	familiar with this specific version of the	04:43:13
8	spreadsheet.	
		04:43:27
11	MS. BAILY: Object to form.	04:43:30
12	A I don't. So there were not a lot of	04:43:34
13	people who had regular access to the P&L. But there	04:43:36
14	would be times where it would make sense, perhaps	04:43:39
15	someone from my team, to save on still on Google	04:43:43
16	Drive, their own version and because of research	04:43:48
17	they were doing, to make changes.	04:43:53
18	And that's why I don't recognize this	04:43:55
19	being at any time the official P&L, because I don't	04:43:59
20	recognize it at all. So it's possible, for example,	04:44:01
21	that whoever may saved this version was looking	04:44:04
22	at headcount issues.	04:44:09
23	Q Okay. Looking just based on looking at	04:44:11
24	two different files, is there a way we would be able	04:44:22
25	to determine whether you were looking at sort of one	04:44:24
		Page 193

Case 3:17-cv-00939-WHA Document 1048-10 Filed 07/28/17 Page 9 of 9 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

1 of the official	P&L versions or one of these sort of	04:44:27
2 individually wo	rkshopped versions?	04:44:31
3 MS. B.	AILY: Object to form.	04:44:34
4 A So if	I had the file name, there was a	04:44:35
5 specific file n	ame used for the official version	04:44:38
6 that I would li	kely recognize.	04:44:45
7 And t	hen there are certainly like this,	04:44:49
8 there are times	when I can just look at the contents	04:44:52
9 and know that i	t's not an official version. But I	04:44:56
10 don't know if I	would be able to identify you	04:44:58
11 know, if there	was one cell change	04:45:00
12 Q Okay.		04:45:03
13 A fro	om an official version, if that was	04:45:03
14 not one.		04:45:05
Q Okay.	And do you recall what the official	04:45:06
16 file name was fo	or the the official versions?	04:45:10
17 A I don	't recall the full name. But	04:45:15
18 certainly there	would be as part of it, in brackets,	04:45:19
19 "Go, slash, Cha	uffeur P&L."	04:45:24
20 And no	ormally when people made their own	04:45:28
21 version to to	o do some testing or to test some	04:45:31
22 changes, for the	emselves they would label they	04:45:36
23 would add on so	me label, like what they were doing	04:45:39
24 it for.		04:45:43
Q Okay.	I'm going to the next tab, which is	04:45:44
		Page 194